National Environmental Achievement Track

Application Form

Multiple Facilities – See Attachment 1

Name of facility

Ingersoll-Rand - Torrington Company - Automotive Division

Name of parent company (if any)

59 Field Street

Street address

P.O. Box 1008

Street address (continued)

Torrington, CT 06790-1008

City/State/Zip code

Give us information about your contact person for the National Environmental Achievement Track Program.

Name **Jack Healy**

Title **Senior Project Engineer**

Phone **860-626-2021**

Fax **860-496-3660**

E-mail **healyj@torrington.com**

Section A

Tell us about your facility.

Why do we need this information?

EPA needs background information on your facility to evaluate your application.

What do you need to do?

- Provide background information on your facility.
- Identify your environmental requirements.

1 What do you do or make at your facility?

See Attachment 2

2 List the Standard Industrial Classification (SIC) code(s) or North American Industrial Classification System (NAICS) codes that you use to classify business at your facility.

SIC
See Attachment 2

NAICS

3 Does your company meet the Small Business Administration definition of a small business for your sector?

☐ Yes ☒ No

4 How many employees (full-time equivalents) currently work at your facility?

☐ Fewer than 50

☐ 50-99

☐ 100-499

☐ 500-1,000

☒ More than 1,000 ***(Breakout for each facility provided on attachment 2***

5 Does your facility have an EPA ID number(s)?

If yes, list in the right-hand column.

☒ Yes ☐ No

See Attachment 2

6 Identify the environmental requirements that apply to your facility. Use the Environmental Requirements Checklist, at the back of the instructions, as a reference. List your requirements to the right ***or*** enclose a completed Checklist with your application.

See Attachment 3

7 Check the appropriate box in the right-hand column.

☐ I've listed the requirements above.

☒ I've enclosed the Checklist with my application.

8 Optional: Is there anything else you would like to tell us about your facility?

Environmental Managements Systems – Torrington Company is in the process of implementing ISO 14001. Certification is scheduled for July 2001. Level 2 Corporate Procedures are scheduled for completion at the end of 2000.

Section B

Tell us about your EMS.

Why do we need this information?

Facilities must have an operating Environmental Management System (EMS) that meets certain requirements.

What do you need to do?

- Confirm that your EMS meets the Achievement Track requirements.
- Tell us if you have completed a self-assessment or have had a third-party assessment of your EMS.

1 Check ***yes*** if your EMS meets the requirements for each element below as defined in the instructions.

a. Environmental policy — ☒ Yes

b. Planning — ☒ Yes

c. Implementation and operation — ☒ Yes

d. Checking and corrective action — ☒ Yes

e. Management review — ☒ Yes

2 Have you completed at least one EMS cycle (plan-do-check-act)? — ☒ Yes

3 Did this cycle include both an EMS and a compliance audit? — ☒ Yes

4 Have you completed an objective self-assessment or third-party assessment of your EMS? — ☒ Yes

If yes, what method of EMS assessment did you use?

☒ Self-assessment (All Facilities)

- ☒ GEMI ☐ Other
- ☐ CEMP

☒ Third-party assessment

- ☐ ISO 14001 Certification
- ☒ Other ***(GEMI - four facilities)***

Section C

Tell us about your past achievements and future commitments.

Why do we need this information?

Facilities must show that they are committed to improving their environmental performance. This means that you can describe past achievements and will make future commitments.

What do you need to do?

Refer to the Environmental Performance Table in the instructions to answer questions 1 and 2.

1 Describe your past achievements for at least two environmental aspects. If you need more space than is provided, attach copies of this page.

Note to small facilities: If you qualify as a small facility as defined in the instructions, you are required to report past achievement for at least one environmental aspect.

First aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units	Quantity	Units
See Attachment 4, Section C, Item 1i				

i. How is the current level an improvement over the previous level?

Torrington has shown a continued commitment to achieving its environmental objectives since 1986. Torrington has demonstrated continuous improvement with various aspects including hazardous and non-hazardous waste, water and energy. For example, the Torrington Company has 1.) removed 100% (57) of its PCB transformers, and 100% of its underground storage tanks to prevent leakeage and ground contamination. 2.) eliminated 100% of its chlorinated solvents, Class 1 ozone-depleting substances. 3.) eliminated copper-plating production of needle bearing drawn cups in order to further reduce the use of hazardous materials and wastewater treatment, and 4.) eliminated plant wastewater lagoons and replaced with improved wasterwater treatments. 5.) Torrington is a charter member of EPA's WasteWi$e Program designed to reduce the generation of basic types of industrial waste, such as grinding sludges, oils, coolants and trash. Torrington is continuing to lower its water consumption and wastewater discharge throughout the company.

In many areas, Torrington continues to develop new processes to reduce emissions and waste, as well as to conserve energy and raw materials. When appropriate, we share this technology with government agencies and industry.

Attachment 4a provides data regarding past performance for the significant environmental aspects that the Torrington Company tracks. As indicated by the data, four of the facilities(Cairo, Dahlonega, Walhalla, and Watertown) do not show continuous improvement based solely on the numbers. As indicated in the cover letter the numbers do adequately portray the efforts of the individual Torrington Company facilities. The percent increases in production versus the aspect measurements are indicated for each of the four facilities is shown on Attachment 4b.

ii. How did you achieve this improvement?

See Attachment 5, Section C, Item 1ii

Second aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units	Quantity	Units
See Attachment 4, Section C, Item 1i				

i. How is the current level an improvement over the previous level?

See Attachment 5, Section C, Item 1i

ii. How did you achieve this improvement?

See Attachment 4, Section C, Item 1ii

2 Select at least four environmental aspects (no more than two from any one category) from the Environmental Performance Table in the instructions and then tell us about your future commitments. If you need more space than is provided, attach copies of this section.

Note to small facilities: If you are a small facility, you are required to make commitments for at least two environmental aspects in two different categories.

As a corporation, The Torrington Company Management has evaluated our environmental issues across all of our facilities and established objectives relative to environmental performance for the following aspects:

- *Hazardous waste generation* (In 1986, the Torrington Company (all divisions) established as a goal the generation of zero hazardous waste, today we are still working toward that objective, Since the establishment of that objective Torrington as a company (all divisions) has reduced the amount of hazardous waste generated by more than 97%. Efforts are still continuing, with some facilities already achieving the goal)
- *Non hazardous waste generation* (In 1991, the Torrington Company (all divisions) introduced a Non Hazardous waste Reduction Program. The goal being to continuously reduce the amount of non hazardous wastes generated. Since the establishment of that objective Torrington (all divisions) as a company has reduced the amount of non hazardous waste by 40%. Efforts are ongoing in this area)
- *Water Use* (Torrington recognizes that water use, and the lack of available potable water world wide is an issue. As Stewards of the environment Torrington Company is committed to use water more efficiently. Therefore, Torrington Company has implemented Water Conservation Programs throughout the Company. Each facility has been challenged to come up with innovative ideas for water conservation, and where process changes/modifications have been successful at one location, they are often transferred to other locations.)
- *Energy Use* (Torrington recognizes that like water, energy use and energy conservation are key aspects relative to the communities in which we work. Efficient energy conservation programs can ensure that our communities have sufficient energy to heat and cool our school and homes, etc. Therefore, Torrington Company through the

implementation of a Company Wide Energy Management Program, as a Company, has been able to reduce the amount of energy used.)

Torrington recognizes that all the aspects may not be the most appropriate to the specific facilities, but overall believes these represent the significant aspects of the Company. Additionally, the Torrington Company recognizes that because we do not measure performance on a unit production basis it may not be immediately obvious that improvements are being achieved. Therefore, in the future, to assist the Agency in evaluating our progress, Torrington may provide a narrative to include engineering calculations to demonstrate continuous improvement. Additionally, within the next six months as a result of the ongoing ISO14001 implementation, the individual facilities will have completed the site-specific aspect identification process and be in a position to select alternative significant aspects, based on site-specific considerations, to be monitored relative to continuous improvement.

First aspect you've selected

a. What is the aspect?	***Hazardous Waste (See Attachment 6)***	
b. Is this aspect identified as significant in your EMS?	☒ Yes ☐ No	
c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.	☒ Option A: Absolute value	*See* ***Attachment 6*** (Quantity/Units)
	☐ Option B: In terms of units of production or output	(Quantity/Units)
d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.	☒ Option A: Absolute value	***Refer to Attachment 6*** (Quantity/Units)
	☐ Option B: In terms of units of production or output	(Quantity/Units)
e. How will you achieve this improvement?	***Refer to Attachment 6***	

Second aspect you've selected

a. What is the aspect?	***Non-hazardous Waste (See Attachment 6)***	
b. Is this aspect identified as significant in your EMS?	☒ Yes ☐ No	
c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.	☒ Option A: Absolute value	***See Attachment 6*** (Quantity/Units)
	☐ Option B: In terms of units of production or output	(Quantity/Units)

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.	☒ Option A: Absolute value	***See Attachment 6*** (Quantity/Units)
	☐ Option B: In terms of units of production or output	(Quantity/Units)
e. How will you achieve this improvement?	***See Attachment 6***	

Third aspect you've selected

a. What is the aspect? ***Water (See Attachment 6)***

b. Is this aspect identified as significant in your EMS? ☒ Yes ☐ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A: Absolute value ***See Attachment 6*** (Quantity/Units)

☐ Option B: In terms of units of production or output (Quantity/Units)

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A: Absolute value ***See Attachment 6*** (Quantity/Units)

☐ Option B: In terms of units of production or output (Quantity/Units)

e. How will you achieve this improvement? ***Refer to Attachment 6***

Fourth aspect you've selected

a. What is the aspect? ***Energy (See Attachment 6)***

b. Is this aspect identified as significant in your EMS? ☒ Yes ☐ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A: Absolute value ***See Attachment 6*** (Quantity/Units)

☐ Option B: In terms of units of production or output (Quantity/Units)

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

☒ Option A: Absolute value ***See Attachment 6*** (Quantity/Units)

☐ Option B: In terms of units of production or output (Quantity/Units)

e. How will you achieve this improvement? ***Refer to Attachment 6***

Section D

Tell us about your public outreach and reporting.

Why do we need this information?

Facilities must demonstrate their commitment to public outreach and performance reporting. You should have appropriate mechanisms in place to identify community concerns, to communicate with the public, and to provide information on your environmental performance.

What do you need to do?

- Describe your approach to public outreach.
- List three references who are familiar with your facility.

1 How do you identify and respond to community concerns?

See Attachment 7

The Torrington Company facilities are located primarily in rural areas. Historically, there has not been a need for a formal communication program. As concerns arise they are addressed locally by the Plant Management team on an as needed basis. In some instances, Corporate Communications group will get involved to assist in responding to a specific issue. Additionally, if employees have concerns they have access to an internal hotline.

2 How do you inform community members of important matters that affect them?

See Attachment 7

Relative to communications with the community, Torrington's policy has traditionally been to do so as required. More recently, The Torrington Company and its facilities have made some efforts to facilitate the sharing of information. As Charter participants in EPA's Waste Wi$e Program and 33/50 Programs, The Torrington Company is proactively making their community/stakeholders aware of the its commitment to the environment.

Attachment 7provides a summary of types of community activities that Torrington and its facilities have been/and continue to be involved in.

In addition, The Torrington Company is in the progress of establishing an environmental performance page on its website, which will be accessible to the public.

3 How will you make the Achievement Track Annual Performance Report available to the public?

☒ Website ***www.torrington.com (Environmental Policy will be added to site tentatively by the first week of October.***

☒ Newspaper

☐ Open Houses

☐ Other

4 Are there any ongoing citizen suits against your facility? ☐ Yes ☒ No

If yes, describe briefly in the right-hand column.

5 List references below

	Organization	*Name*	*Phone number*
Representative of a Community/ Citizen Group	***See Attachment 8***		
State/Local Regulator			
Other community/local reference			

Section E

Application and Participation Statement.

On behalf of ***The Torrington Company,***

I certify that

- I have read and agree to the terms and conditions, as specified in the *National Environmental Achievement Track Program Description* and in the *Application Instructions*;
- I have personally examined and am familiar with the information contained in this Application (including, if attached, the Environmental Requirements Checklist). The information contained in this Application is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete, and I have no reason to believe the facility would not meet all program requirements;
- My facility has an environmental management system (EMS), as defined in the Achievement Track EMS requirements, including systems to maintain compliance with all applicable federal, state, tribal, and local environmental requirements, in place at the facility, and the EMS will be maintained for the duration of the facility's participation in the program;
- My facility has conducted an objective assessment of its compliance with all applicable federal, state, tribal, and local environmental requirements, and the facility has corrected all identified instances of potential or actual noncompliance;
- Based on the foregoing compliance assessment and subsequent corrective actions (if any were necessary), my facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with applicable federal, state, tribal, and local environmental requirements.

I agree that EPA's decision whether to accept participants into or remove them from the National Environmental Achievement Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

I am the senior facility manager and fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is applying to this program.

Signature/Date	
Printed Name/Title	Jack Healy/Senior Project Engineer Corporate Plant Engineering
Facility Name	The Torrington Company
Facility Street Address	59 Field Street P.O. Box 1008 Torrington, CT 06790-1008
Facility ID Numbers	All facility EPA ID #s are listed in Section A; Item 5

The National Environmental Performance Track is a U.S. Environmental Protection Agency program. Please direct inquiries to 1-888-339-PTRK or e-mail ptrack@indecon.com. Mail completed applications to:

The Performance Track Information Center
c/o Industrial Economics Incorporated
2067 Massachusetts Avenue
Cambridge, MA 02140

Attachment 1
Facility Location Information

Facility Locations:

Cairo, GA
Clinton, SC
Dahlonega, GA
Honea Path, SC
Sylvania, GA
Walhalla, SC
Watertown, CT

Address: The Torrington Company, 2525 Torrington Drive, Cairo, GA 31728
The Torrington Company, Old Laurens Road, P.O. Box 667, Clinton, SC 29325
The Torrington Company, 615 Torrington Drive, Dahlonega, GA 30533
The Torrington Company, Brickmill Road, P.O. Box 565, Honea Path, SC 29654
The Torrington Company, 400 Friendship Road, P.O. Box 1667, Sylvania, GA 30467
The Torrington Company, 430 Torrington Road, P.O. Box 100, Walhalla, SC 29691
The Torrington Company, 156 Park Road, Watertown, CT 06795

Additional Contact Person:

Law Engineering & Environmental Services, Inc.
Sarah Hansen
Assistant Vice President
Tel: 770/421-3475
Fax: 770/421-3486
E-mail:shansen1@lawco.com

Attachment 2
Section A, Items 1 through 5
Facility Manufacturing Information

1. What do you make at your facility?

- Cairo, GA – Manufacture of bearings for the automotive industry.
- Clinton, SC – Manufacture of needle bearings primarily for the automotive industry.
- Dahlonega, GA – Manufacture of rollers for the automotive industry and other locations.
- Honea Path, SC – Manufacture automotive components.
- Sylvania, GA – Manufacture of needle bearings for the automotive industry.
- Walhalla, SC – Manufacture needle bearings primarily for the automotive industry.
- Watertown, CT – Manufacture of steering columns.

2. List the Standard Industrial Classification (SIC) codes or North American Industrial Classification System (NAICS) codes that you use to classify business at your facility?

The following are SIC codes for each of the respective facilities:

- 3562 - Clinton, Dahlonga, Sylvania, Walhalla, Cairo
- 3714 - Watertown, Honea Path

3. **Does your company meet the Small Business Administration definition of a small business for your sector?**

No.

4. How many employees (full-time equivalents) currently work at your facility?

Cairo, GA	560 employees
Clinton, SC	1,439 employees
Dahlonega, GA	298 employees
Honea Path, SC	678 employees
Sylvania, GA	540 employees
Walhalla, SC	433 employees
Watertown, CT	427 employees

5. Does your facility have an EPA ID number(s)?

Yes.

Cairo, GA	GAD082826355
Clinton, SC	SCD003345683
Dahlonega, GA	GAD097800411
Honea Path, SC	SCD050196310
Sylvania, GA	GAD065344301
Walhalla, SC	SCD003344918
Watertown, CT	CTD982896333

National Performance Track Application
The Torrington Company Automotive Division
Job # 12000-0-2057
Date: September 26, 2000

Attachment 3
Section A; Item 6
Environmental Requirements Checklist

	ASPECTS	Cairo, GA	Clinton, SC	Dahlonega, GA	Honea Path, SC	Sylvania, GA	Walhalla, SC	Watertown, CT
	Air Pollution Regulations							
1	Incidental amounts of hazardous wastes have been generated Hazardous Air Pollutants (40 CFR 61)			X		X		X
2	Permits and Registration of Air Pollution Sources		X	X	X	X	X	X
3	General Emission Standards, Prohibition and Restrictions		X	X	X		X	X
4	Control of Incinerators						X	
5	Process Industry Emission Standards				X		X	
6	Control of Fuel Burning Equipment	X	X		X	X	X	
7	Control of VOC's		X			X		
8	Sampling, Testing and Reporting	X	X			X		X
9	Visible Emissions Standards		X		X		X	
10	Control of Fugitive Dust		X					
11	Toxic Air Pollutants Control				X		X	
12	Vehicle Emissions Inspection and Testing							
13	Other Federal, State, Tribal or Local Air Pollution Regulation not Listed Above (identify)							
14	Conditional Major Title V Air Permit issued by South Carolina		X					
	Hazardous Waste Management Regulations							
1	Identification and Listing of Hazardous Waste (40 CFR 261)							
	-Characteristic Waste	X	X	X		X	X	X
	-Listed Waste	X	X	X	X	X		X
2	Standards Applicable to Generators of Hazardous Waste (40 CFR 262)							
	-Manifesting	X	X	X		X		X
	-Pre-transport requirements	X	X	X		X		X
	-Record Keeping/reporting	X	X	X		X		X
3	Standards Applicable to Transporters of Hazardous Waste (40 CFR 263)							
	-Transfer facility requirements					X		X
	-Manifest system and record-keeping					X		X
	-Hazardous waste dischargers					X		
4	Standards for Owners and Operators of TSD facilities (40 CFR 264)							
	-General facility Standards		X			X		
	-Preparedness and prevention		X			X		
	-Contingency plan and emergency procedures		X			X		
	-Manifest system, record keeping and reporting		X			X		
	-Groundwater protection		X			X		
	-Financial requirements		X			X		
	-Use and Management of containers		X			X		
	-Tanks					X		
	-Waste piles							
	-Land treatment							
	-Incinerators							

Prepared by: Christie Zerbe
Date: September 26, 2000
Checked by: Carrie Weisse
Date: September 26, 2000

Attachment 3
Section A; Item 6
Environmental Requirements Checklist

	ASPECTS	Cairo, GA	Clinton, SC	Dahlonega, GA	Honea Path, SC	Sylvania, GA	Walhalla, SC	Watertown, CT
5	Interim Status Standards for TSD Owners and Operators (40 CFR 265)							
6	Interim Standards for Owners and Operators of New Hazardous Waste Land Disposal Facilities (40 CFR 267)							
7	Administered Permit Program (Part B) (40 CFR 270)		X			X		
8	Other Federal, State, Tribal or Local Hazardous Waste Management Regulation Not Listed Above (identify)				X		X	
	Conditionally exempt small quantity generator (40 CFR 261.5)				X		X	
	Hazardous Materials Management							
1	Control of Pollution by Oil and hazardous Substances (33 CFR 15	X	X			X		
2	Designation of Reportable Quantities and Notification of Hazardous Materials Spill (40 CFR 302)	X	X	X	X	X	X	X
3	Hazardous Materials Transportation Regulations (49 CFR 172-17	X	X		X	X	X	X
4	Worker Right-to-Know Regulations (29 CFR 1910.1200)	X	X	X	X	X	X	X
5	Community Right-to-Know Regulations (40 CFR 350-372)	X	X	X	X	X	X	X
6	Other Federal, State, Tribal or Local Hazardous Materials Management Not Listed Above (identify)							
	Solid Waste Management							
1	Criteria for Classification of Solid Waste Disposal Facilities and Practices (40 CFR 257)		X					X
2	Permit Requirement for Solid Waste Disposal Facilities		X					X
3	Installation of Systems of Refuse Disposal							
4	Solid Waste Storage and Removal Requirements		X					X
5	Disposal Requirements for Special Waste				X		X	
6	Other Federal, State, Tribal or Local Solid Waste Management Regulations not Listed Above (identify)							
	Water Pollution Control Requirements							
1	Oil Spill Prevention Control and Countermeasure (SPCC) (40 CFF	X	X	X	X	X	X	X
2	Designation of Hazardous Substances (40 CFR 116)			X		X		X
3	Determination of Reportable Quantities for Hazardous Substances (40 CFR 117)		X	X				X
4	NPDES Permit Requirements (40 CFR 122)				X		X	X
5	Toxic Pollutant Effluent Standards (40 CFR129)	X						
6	General Pretreatment Regulations for Existing and New Sources (40 CFR 403)	X		X	X	X	X	
7	Organic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 414)							
8	Inorganic Chemical Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 415)							
9	Plastics and Synthetics Point Sources Effluent Guidelines and Standards (40 CFR 416)							
10	Water Quality Standards					X		
11	Effluent Limitations for Direct Dischargers				X		X	

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Date: September 26, 2000
Checked by: Carrie Weisse
Date: September 26, 2000

Attachment 3
Section A; Item 6
Environmental Requirements Checklist

	ASPECTS	Cairo, GA	Clinton, SC	Dahlonega, GA	Honea Path, SC	Sylvania, GA	Walhalla, SC	Watertown, CT
12	Permit Monitoring/Reporting Requirements	X		X	X	X	X	X
13	Classifications and Certifications of Operators and Superintendents of Industrial Wastewater Plants	X		X	X	X	X	
14	Collection, Handling, Processing of Sewage Sludge							
15	Oil Discharge Containment, Control, and Cleanup	X			X	X		
16	Standards Applicable of Indirect Discharges (Pretreatment)			X	X	X	X	
17	Other Federal, State, Tribal or Local Water Pollution Control Regulations not Listed Above (identify)						X	
	State Lab Certification (Pb)						X	
	Drinking Water Regulations							
1	Underground Injection and Control Regulation, Criteria and Standards (40 CFR 144, 146)					X		
2	National Primary Drinking Water Standards (40 CFR 141)							
3	Community Water Systems, Monitoring and Reporting Requirements (40 CFR 141)							
4	Permit Requirements for Appropriations/Use of Water from Surface or Subsurface Sources							
5	Underground Injection Control Requirements							
6	Monitoring and Record keeping Requirements Community Water Systems							
7	Other Federal, State, Tribal or Local Drinking Water Regulations not Listed Above (identify)							
	Toxic Substances							
1	Manufacture and Import of Chemicals, Record keeping and Reporting Requirements (40 CFR 704)							X
2	Import and Export of Chemical (40 CFR 707)							
3	Chemical Substances Inventory Reporting Requirements (40 CFR 710)			X				
4	Chemical Information Rules (40 CFR 712)							
5	Health and Safety Data Reporting (40 CFR 716)							
6	Pre-Manufacture Notifications (40 CFR 720)							
7	PCB Distribution, Use, Storage and Disposal (40 CFR 761)				X			
8	Regulations on Use of Fully Halogenated Chlororfluoroalkanes (40 CFR 762)							
9	Storage and Disposal of Waste Material Containing TCDD (40 CFR 775)							
10	Other Federal, State, Tribal or Local Toxic Substances Regulations not Listed Above (identify)				X			
	Asbestos Regs. Related to Demolition/Renovation				X			
	Pesticide Regulations							
1	FIFRA Pesticide Use Classification (40 CFR 162)							
2	Procedures for Disposal and Storage of Pesticides and Containers (40 CFR 165)	X						
3	Certification of Pesticide Applications (40 CFR 171)							
4	Pesticide Licensing Requirements							
5	Labeling of Pesticides							
6	Pesticide Sales, Permits, Records, Application and Disposal Requirements							

Prepared by: Christie Zerbe
Date: September 26, 2000
Checked by: Carrie Weisse
Date: September 26, 2000

Attachment 3
Section A; Item 6
Environmental Requirements Checklist

	ASPECTS	Cairo, GA	Clinton, SC	Dahlonega, GA	Honea Path, SC	Sylvania, GA	Walhalla, SC	Watertown, CT
7	Disposal of Pesticide Containers	X						
8	Restricted Us and Prohibited Pesticides							
9	Other Federal, State, Tribal or Local Pesticides Regulations not Listed Above (identify)							
	Environmental Clean-up, Restoration, Corrective Action							
1	Comprehensive Environmental Response, Compensation and Liability Act (Superfund) (identify)							
2	RCRA Corrective Action (identify)					X		
	Part B HW-056					X		
3	Other Federal, State, Tribal or Local Environmental Clean-up, Restoration, Corrective Action Regulations not Listed Above (identify)							

Prepared by: Christie Zerbe
Date: September 26, 2000
Checked by: Carrie Weisse
Date: September 26, 2000

Attachment 4A

Section C-1; Item 1i
Past Enviromental Performance Summary

ASPECTS	Hazardous Waste Generated (pounds/year)				Non-hazardous Waste Generated (millions pounds/year)				Water Used (millions gallons/year)				Energy Used (KWHR/year) (electricity)			
Facility	1996 Baseline/yr	1997	1998	1999	1996 Baseline/yr	1997	1998	1999	1992 Baseline/yr	1997	1998	1999	1996 Baseline/yr	1997	1998	1999
Cairo, GA	0	0	9	0	1.17	1.70	1.7	1.78	35.01	26.95	38.05	36.25	33.40	33.50	35.62	36.32
Clinton, SC (1)	219,592	50,758	14,320	18,751	7.42	4.70	4.3	5.44	116.20	78.95	85.15	77.98	63.61	65.23	67.61	68.64
Dahlonega, GA	660	844	292	1,970	5.09	4.88	5.1	5.15	39.91	45.12	43.40	38.93	24.95	23.20	23.18	23.64
Honea Path, SC	760	1,725	800	275	2.69	2.03	2.1	1.64	27.79	27.89	29.69	28.28	22.88	22.10	23.13	25.14
Sylvania, GA	68,850	7,292	706	367	1.53	1.34	1.1	1.10	20.06	22.49	21.77	26.49	26.30	26.51	26.01	26.31
Walhalla, SC	0	385	0	1,150	2.09	2.19	1.97	2.13	51.92	16.73	18.38	18.31	15.55	16.25	17.25	18.19
Watertown, CT (2)	550	830	2,065	890	2.10	1.93	1.4	1.99	2.58	2.61	2.55	2.66	11.42	11.70	11.20	9.64
Totals: Torrington - Automotive Division	**290,412**	**61,834**	**20,190**	**23,403**	**22.09**	**18.77**	**17.67**	**19.23**	**293.47**	**220.74**	**238.99**	**228.90**	**198.11**	**198.49**	**204.00**	**207.88**

(1) Haz. Waste volumes decreased in 1998 and increased in 1999 because wastes generated in 1998 were actually disposed in 1999.
Water increases in 1998 are due to fluctuations in production
(2) Watertown Facility was not yet in operation in 1992, therefore the baseline for Watertown is 1996

Shading indicates environmental aspects where past achievements are documented (refer to Attachment 5 for documentation of how achievements were accomplished)

Revised by: Andrea Bockrath
Checked by: Sarah Hansen
Date November 16, 2000
Prepared by: Christie Zerbe
Date: September 26, 2000
Checked by: Taura Nichols
Date: September 29, 2000

Attachment 4B

Section C-1; Item 1i

Production Increases VS Past Environmental Aspect Performance

Facility	1997-1998		1998-1999	
	Production Increase	Aspect Performance (% change [1] between 1997 and 1998)	Production Increase	Aspect Performance (% change [1] between 1997 and 1998)
Cairo	10%	Non-hazardous: no change	13%	Non-hazardous Waste: (+5%)
		Energy: (+6%)		Energy: (+2%)
Dahlonega	26%	Water: (-4%)	10%	Water: (-10%)
		Energy: (<-1%)		Energy: (+2%)
Walhalla	4%	Non-hazardous Waste: (-10%)	7%	Non-hazardous Waste: (+7%)
		Energy: (<-1%)		Energy: (+5%)
Watertown	5%	Hazardous Waste: (+60%)	6%	Hazardous Waste: (-57%)
		Energy: (-4%)		Energy: (-14%)

[1] Where a (+) indidcates an increase and a (-) represents a reduction

Prepared by: Christie Zerbe
Checked by Sarah Hansen
Date: November 16, 2000

Attachment 5
Section C; Item 1ii
Aspects-
Facility Specific Environmental Programs for Past Achievements

Cairo: GA	
Non-hazardous Waste	* Implemented returnable donnage program in order to reduce packaging waste * Made improvements to inventory control * Implemented cardboard bailing to reduce volumes of non-hazardous waste * Eliminated the use of drums by replacing them with returnable totes for chemical storage
Energy	* Added a new chiller water system which resulted in an energy conservation of 20-30%
Clinton: SC	
Hazardous Waste Reduction	* Replaced chlorinated solvent degreasers with alkaline washing solutions, thereby eliminating hazardous waste generation from degreasers * Most copper plating processes have been eliminated thereby reducing the generation of cyanide containing hazardous waste * Replaced salt bath operations
Water Reduction	* Completed a water use audit and identified areas where water was being inefficiently used and implemented corrective actions to conserve water *Use of treated groundwater from a groundwater recovery system to supplement their process water, thus reducing water demand
Dahlonega: GA	
Water Reduction	* Water from tumbling operation is recycled back into the process water after filtration, reducing local water demand and waste water discharges * Constructed a new wastewater treatment system which reduced water use by 24,000 gallons per day. Note: Because Torrington is the communities largest water user, reductions in the facilities water use had a significant positive impact on the community.
Energy	* Implemented an ongoing Air Leak Detection Program which includes periodic leak detection surveys, air leak tag programs. Reducing air leaks saves on the electricity consumed to maintain system pressure
Honea Path: SC	
Hazardous Waste Reduction	* Replaced chlorinated solvent degreasers with alkaline washing solutions to eliminate the generation of chlorinated solvent containing hazardous wastes
Non-hazardous Waste	* Implemented returnable donnage program to reduce packaging waste * Initiated program in order to recycle/reuse wood from the pallets * Initiated Oberlin swarf management system to separate out oil and water from the swarf, thus generating less solid waste and allowing oil to be recycled and reduce water use

Prepared by: Andrea Bockrath
Checked by: Sarah Hansen
Date: November 16, 2000

Attachment 5
Section C; Item 1ii
Aspects-
Facility Specific Environmental Programs for Past Achievements

Sylvania: GA	
Hazardous Waste Reduction	*Process modifications were incorporated to eliminate the need for copper plated parts, thereby eliminating the generation of cyanide containing hazardous wastes * Replaced chlorinated solvent degreasers with alkaline washing solutions to eliminate the generation of chlorinated solvent containing hazardous wastes
Non-hazardous Waste	* Implemented returnable donnage program in order to reduce packaging waste * Recycle wood from the pallets * Initiated Oberlin swarf management system in order to separate out oil and water from the swarf, thus generating less solid waste and allowing oil to be recycled and reduce water use
Walhalla: SC	
Non-hazardous Waste	* Initiated program with vendors to filter used oil for reuse
Energy	* Improved ventilation within the heat treat area which in turn reduced cooling costs * Installed new energy efficient lighting system and air compressors and chillers
Watertown: CT	
Hazardous Waste	*Manufacturing processes in Watertown were designed to avoid the generation of hazardous wastes
Energy Reduction	* The plant has initiated a program to prohibit the operation of the electric heat and electric cooling at the same time reducing inefficiencies in the temperature control of the building * A five ton chiller was installed to the cam cell welders in order to allow the temperature in the cooling tower to be raised for more efficient operation and to conserve electricity

Prepared by: Andrea Bockrath
Checked by: Sarah Hansen
Date: November 16, 2000

Attachment 6
Section C, Item 2
Future Environmental Aspects and Performance

		OBJECTIVE	
	1999 (current)	2003	How to be Achieved
The Torrington Company Total			
Water (MG/Y)	229.00	Overall reduction of 2.5%	* Continued Implementation of Water Conservation Programs
Hazardous Waste (pounds/YR)	23,403	14,000 (60% Reduction)	* Torrington has a company wide initiative replace mercury containing light bulbs with low mercury "green" bulbs.
Non Hazardous Waste (Million pounds/yr)	19	18.7 (1.5% Reduction)	* To reduce non-hazardous waste, Torrington has a company wide initiative to replace drums with returnable totes for chemical storage and ship products to customers in returnable donnage
Energy (KWHR)	208	1% Reduction	* Continued Implementation of Energy Management Programs
Cairo; GA			
Water (MG/Y)	36.25	1-2% Reduction	* The Oberlin swarf management system (see nonhazardous waste program description) wil reduce water consumption by recycling water.
Hazardous Waste (pounds/YR)	0	no change	* The facility has already reached the Torrington objective of 0 hazardous waste generation.
Non Hazardous Waste (Million pounds/yr)	1.78	1-5% Reduction	* Change lubricants * An Oberlin swarf management system will be installed which allows oils to be recycled, thus generating less solid waste.
Energy (KWHR)	36.32	1-2% Reduction	* New and more efficient air conditioning controls will be added to reduce electricity consumption. Additionally, the use of gas heaters will be discontinued, to be replaced with more energy efficent equipment

Prepared by: Andrea Bockrath
Check by: Sarah Hansen
Date: November 16, 2000

Attachment 6
Section C, Item 2
Future Environmental Aspects and Performance

		OBJECTIVE	
	1999 (current)	**2003**	**How to be Achieved**
Clinton: SC			
Water (MG/Y)	77.98	no change	* Continue consistent with past efforts (refer to Attachment 5)
Hazardous Waste (pounds/YR)	18,751	25% reduction	* Clinton will modify their processes so that copper platted parts will not have to be used. * Clinton will no longer produce cyanide containing hazardous waste when copper plating is discontinued.
Non Hazardous Waste (Million pounds/yr)	5.44	no change	* Continue consistent with past efforts (refer to Attachment 5)
Energy (KWHR)	68.64	1%	* Chillers will be replaced with more energy efficient chillers with a 40% to 50% reduction in energy consumption per chiller.
Dahlonega: GA			
Water (MG/Y)	38.93	1-3% Reduction	* Process modification to add a filter and reusing process water thereby reducing water consumption and chemical use. * The Dahlonega plant has an agreement with the Water Authority to purchase specific volumes of water to ensure proper functioning of the water distribution system. * The Oberlin swarf management system (see nonhazardous waste program description) will also reduce water consumption by recycling water.
Hazardous Waste (pounds/YR)	1970	0-5% Reduction	* The facility is considering an alternative to grind and burn testing. Replacement or modification to these processes will reduce hazardous waste generation. * Improve maintenance systems
Non Hazardous Waste (Million pounds/yr)	5.15	1-2% Reduction	* Develop and Implement an Non Hazardous Management Plan
Energy (KWHR)	23.64	1 to 5% Reduction	* Installation of more energy efficient hydrostatic drivers and lighting ("green lamps") * Modifications to the heat treat furnaces to reduce energy use. * Implementation of Air Leak Detection Program

Prepared by: Andrea Bockrath
Check by: Sarah Hansen
Date: November 16, 2000

Attachment 6
Section C, Item 2
Future Environmental Aspects and Performance

		OBJECTIVE	
	1999 (current)	2003	How to be Achieved
Honea Path: SC			
Water (MG/Y)	28.28	1-3% Reduction	*Add an Oberlin swarf management system (see nonhazardous waste program description) will also reduce water consumption by recycling water.
Hazardous Waste (pounds/YR)	275	no change	* Hazardous waste generation at Honea Path is minimal consisting primarily of fluorescent light bulbs and maintenance waste. Honea Path will continue to switch light bulbs to low mercury "green" bulbs.
Non Hazardous Waste (Million pounds/yr)	1.64	<1% Reduction	* The Oberlin swarf management system which allows oils to be recylced thus generating less solid waste
Energy (KWHR)	25.14	1% Reduction	* Pneumatic controls will be replaced with energy efficient electronic controls.
Sylvania: GA			
Water (MG/Y)	26.49	Expect Increase (see note 1)	* Continue consistent with past efforts (refer to Attachment 5)
Hazardous Waste (pounds/YR)	367	Expect Increase (see note 1)	* Continue consistent with past efforts (refer to Attachment 5)
Non Hazardous Waste (Million pounds/yr)	1.10	Expect Increase (see note 1)	* Continue consistent with past efforts (refer to Attachment 5)
Energy (KWHR)	26.31	Expect Increase (see note 1)	* Continue consistent with past efforts (refer to Attachment 5)
Walhalla: SC			
Water (MG/Y)	18.31	Expect Increase (see note 1)	* Continue consistent with past efforts (refer to Attachment 5)
Hazardous Waste (pounds/YR)	1150	no change to eliminate	* Walhalla will evaluate different product marking alternative which will use a low flash point solvent based carrier thus reducing hazardous waste generation.
Non Hazardous Waste (Million pounds/yr)	2.13	Expect Increase (see note 1)	*The facility will continue to reduce drum usage and buy chemicals in bulk using returnable totes. * The facility will continue to recycle cardboard and pallets
Energy (KWHR)	18.19	Expect Increase (see note 1)	* A new HVAC system will be installed including new controls and new air handlers which will give a 10 to 15% reduction in electricity used for cooling/heating.

Prepared by: Andrea Bockrath
Check by: Sarah Hansen
Date: November 16, 2000

Attachment 6
Section C, Item 2
Future Environmental Aspects and Performance

		OBJECTIVE	
	1999 (current)	2003	How to be Achieved
Watertown: CT			
Water (MG/Y)	2.66	0-2% Reduction	* Process Modification for Coating System in progress to move from a "Burn-Off" cleaning process to a fluidized bed process. The net result will be a more energy efficient process where less sludge (nonhazardous waste) is generated and less water is used because equipment will not need to be washed.
Hazardous Waste (pounds/YR)	890	no change	* The facility manufacturing processes were designed to avoid hazardous waste generation. Incidental amounts of hazardous wastes continue to be generated as a result of maintenance activities.
Non Hazardous Waste (Million pounds/yr)	1.99	1-5% Reduction	* Process Modification for Coating System in progress to move from a "Burn-Off" cleaning process to a fluidized bed process. The net result will be a more energy efficient process where less sludge (nonhazardous waste) is generated and less water is used because equipment will not need to be washed
Energy (KWHR)	9.64	1% Reduction	* Process Modification for Coating System in progress to move from a "Burn-Off" cleaning process to a fluidized bed process. The net result will be a more energy efficient process where less sludge (nonhazardous waste) is generated and less water is used because equipment will not need to be washed

Note 1: The Torrington Company is constantly reassing its production capablities, relative to maximizing use of its resources. Currently the Sylvania and Walhalla Plants are undergoing significant upgrades, which will result in new process lines at these facilites which will greatly increase the production output. Therefore, actual volumes of wastes generated as well as resources utlitzed will increase over the next few years.

Prepared by: Andrea Bockrath
Check by: Sarah Hansen
Date: November 16, 2000

Attachment 7
Section D; Items 1 and 2
Community Activities

Community Activities
* The Torrington Company is a Charter Member of WasteWi$e Program assisted its parent company - Ingersoll Rand in becoming a WasteWi$e 1998 Award and Recognition Recipient by reducing metal grinding swarf and wood waste.
* In conjunction with the EPA's 33/50 Program, Torrington became a published success story for the EPA's WRITE Program by collaborating with EPA's Risk Reduction and Innovative Technology Laboratory (RREL), and the Connecticut Hazardous Waste Management Service (CHWMS) in evaluating a typical workplace environment. Examples of prototype or innovative technologies that resulted from the collaborative efforts include: - cadmium and chromium recovery from electroplating rinsewaters, and - in-house methods for managing and recycling coolants and oils (this paper was also presented to the 2nd Annual Environmental Exposition and Conference
* Provided Hazardous Materials training to local fire department at no charge (Cairo)
* Presented Waste Minimization Program at a to Connecticut DEP Seminar
* Provided advice and chemical absorbants in support of a response to a spill of Muriatic Acid at Brunswick Golf in Torrington, CT
* Representative of Torrington gave a presentation to Litchfield High School regarding hazardous waste
* Donated time, equipment and funds for Household Hazardous Waste Collection days for the City of Torrington, CT
* Representative of Torrington has been on the Advisory Committee of the Environmental Science Program at Naugatuck Valley Community - Technical College in Waterbury, CT for fifteen years * Articles have been published in local newsletters regarding Torrington's continuous improvement in areas of environmental performance (i.e. Waste reduction and recycling efforts)
* Donated time and equipment as part of River clean-up project in Waterbury, CT
* Provided the largest monetary donation to the United Way Annual Campaign in Laurens County SC, for the past nine years (Clinton)
* Plant manager is the chairman for the Laurens County Education Enrichment Fund (LCEEF) an organization that promotes excellence in public education (Clinton)
* Personnel have been released to read with elementary school students and to serve as mentors for middle school students (Clinton).
* Sponsored several high school students to attended the 2000 South Carolina Business Week at Presbyterian College (Clinton)
* Facilitated the process of obtaining Manufacturing Certification materials from Piedmont Technical College for use in both county high schools. Supported the introduction of FAMS, Ford Academy of Manufacturing Sciences, in both high schools. Shadowing, mentoring and internship experiences at Torrington support these two educational efforts (Clinton).
* Torrington accomplishments and goals with respect to environmental matters are communicated to its employees, managers and stockholders through the Ingersoll-Rand Annual Report
* Donated time to help guide the Northwestern Connecticut Household Hazardous Waste Committee in addressing hazardous waste generation (Corporate)
* Assisted with Solid Waste Management Plan for Lumpkin County in 1994 (Dahlonega)
* Donated 3 Scott Airpacks to the Fire Department and Volunteered for roadside cleanup (Walhalla)
* Donated a CPR Mannequin to the local fire department (Dahlonega)
* Allow environmental classes from the local community college to visit and tour the facility (Watertown)
* Served on the Solid Waste Advisory Committee for the town of Litchfield, CT

Prepared by: Christie Zerbe
Date: September 27, 2000

Attachment 8
Section D; Item 5
References

Facility	Organization	Name	Phone Number
Cairo, GA			
Representative of Com	Mayor of Cairo	Dan Wells	912/377-1722
State/Local Regulator	Georgia EPD Water Protection Division	Stan Donehoe	404/362-2680
Other community/local	Grady County Administrator	Bill Moye	912/377-1512
Clinton, SC			
Representative of Com	Laurens County Water and Sewer Commission	Jack Earle	864/682-3250
State/Local Regulator	South Carolina DHEC	Cynde Devlin	864/896-4020
Other community/local	Director Laurens County Water and Chamber of Commerce	Marvin Moss	864/833-2716
Dahlonega, GA			
Representative of Com	President - Lumpkin County Chamber of Commerce	Cindy Baily	706/864-3711
State/Local Regulator	Georgia Department of Environmental Protection	Ben Tidwell	404/362-2680
Other community/local	Superintendent Lumpkin County Schools	David Luke	706/864-3611
Honea Path, SC			
Representative of Com	Mayor of Honea Path	Lollis Meyers	864/ 369-2466
State/Local Regulator	Anderson County Dept.of Health and Environmental Control	Richard Philiips	864/260-5569
Other community/local	Local POTW Regulator	Henry Black	864/369-2968
Sylvania, GA			
Representative of Com	County Commissioner	Hobson Parker	912/564-7151
State/Local Regulator	Solid Waste Director	Vernon Edenfield	912/864-7480
Other community/local	State Senator	Jack Hill	912/557-4802
Walhalla, SC			
Representative of Com	Walhalla Fire Department	Greg Fowler	864/638-4345
State/Local Regulator	Industrial Coordinator Oconee Sewer Commission	Edd Mize	864/972-3900
Other community/local	Mayor of Walhalla	Bill Whitmire	864/638-4343
Watertown, CT			
Representative of Com	Director Torrington Area Health District	Jim Rokos	860/489-0436
State/Local Regulator	Senior Sanitary Engineer Connecticut Department of Environmental Protection	David Cherico	860/424-3837
Other community/local	Department Chairman Professor Industrial Environmental Toxicology Naugatuck Valley Community College	Cynthia Donaldson	203/596-8703

Prepared by: Christie Zerbe
Date: September 26, 2000
Checked by: Taura Nichols
Date: September 29, 2000

LAWGIBB GROUP

November 17, 2000

Ms. Becky B. Allenbach, Environmental Scientist
Environmental Protection Agency
Sam Nunn Atlanta Federal Center
61 Forsyth Street, S.W.
Atlanta, Georgia 30303

Subject: **Revised National Performance Tract Application**
LAW Project No. 12000-0-2057

Dear Ms. Allenbach:

On behalf of the Torrington Company, attached please find two copies of the revised National Performance Track Application for the Torrington Company. The Application has been modified to reflect our discussions of 9 November 2000, which focused on your comments provided via email on 2 November 2000. Additionally, in the process of addressing your specific comments we believe that we have also addressed the comments received on 27 October, 2000 from EPA's contractor (Industrial Economics Incorporated - IEI) who was simultaneously reviewing the Application. Two copies of the revised application have also been forwarded to IEI.

To facilitate your review of the revised Application we have repeated your comment (in italics) below followed by Torrington's response (in bold).

Comment 1. *The chart on past achievements (Section C) shows that only 3 of the plants have improved in 2 areas. The Cairo, Dahlonega, Walhalla and Watertown facilities do not show past improvements in 2 areas and there is no explanation(ie., increased production, etc.) We need to address this.*

Response: **Agreed, the raw numbers are not, by themselves, indicative of continuous improvement, however, as discussed these facilities have performed to these numbers while production has increased. The following table indicates the production increases at each of the facilities:**

Facility	1997 to 1998 production increase	1998 to 1999 production increase
Cairo	**10%**	**13%**
Dahlonega	**26%**	**10%**
Walhalla	**4%**	**7%**
Watertown	**5%**	**6%**

Relative to measuring improvement, the percentage production increase is far greater than any increase in measure relative to each of the aspects. A comparison of these percentage production increases to trends in the aspect m etrics is provided in Section C.

Comment 2. *Regarding future commitments, the application specifies reductions to be achieved by 2005. If you refer to page 11 of the application instructions, it specifies that we are looking for improvements to be made within the next 3 years. Can you modify your commitments to meet something by 2003?*

LAW Engineering and Environmental Services, Inc.
3200 Town Point Drive, N.W., Suite 100 • Kennesaw, GA 30144
770-421-3400 • Fax: 770-421-3486

Response: **The Application has been revised to include objectives for 2003.**

Comment 3. *Regarding future commitment #4, energy, there is no measurable goal listed. Can you make a measurable commitment here?*

Response: **Based upon our discussions a measurable commitment has been provided. The commitment is based on engineering estimates from planned energy management activities. Because of the uncertainty associated with the estimates the performance objectives have been stated as a range. The overall objective for the company is use energy more efficiently. If production continues to increase the use of electricity will also increase. In that case continuous improvement would be evidenced if the percent production increase exceeded the percent increase in energy use.**

Comment 4. *Given that this is a multi-facility application, we would like you to agree to commit that each facility will improve to some extent in each of the areas. If you want to make your total commitment a corporate total, we would like for you to commit to report improvements for each facility in your annual report.*

Response: **Commitments have been provided for each facility.**

Comments received from IEI:

Comment 1: *Past achievements need to be differentiated from how future commitments will be achieved.*

Response: **The information formerly provided on one table has been divided into two separate tables (refer to Attachments 5 and 6 respectively in revised Application).**

Comment 2: *Future commitments need to include the current generation rates.*

Response: **The current generation rates (1999 is the most current calendar for which a complete set of data exists) are included on Attachment 6 to the revised application.**

If you have any questions regarding this revised National Performance Track Application for the Torrington Company, please contact either one of us at 770-421-3400, or Mr. Jack Healy with the Torrington Company at 860-626-2021.

Sincerely,

LAW ENGINEERING AND ENVIRONMENTAL SERVICES, INC.

By [illegible] with permission

Andrea M. Bockrath, CHMM
Senior Scientist
Project Coordinator

Sarah S. Hansen, CHMM.
Assistant Vice President
Principal/Project Manager

Enclosures

cc: Industrial Economics Incorporated

AMB/SSH:jdc

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